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ILLINOIS COMMERCE
COMMISSION

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2015 MAY 15 A 11:46

CHIEF CLERK'S OFFICE

May 14, 2015

VIA HAND DELIVERY

Ms. Elizabeth Rolando
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Re: 14-NOI-01 ComEd's Reply Comments

Dear Ms. Rolando:

Pursuant to the Illinois Commerce Commission's Notice of Inquiry ("NOI") dated September 30, 2014, Commonwealth Edison Company submits the enclosed Responses to April 28, 2015 Follow-Up Questions in accordance with the schedule set forth in the NOI.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Mark R. Johnson

Enclosures

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	:	
On Its Own Motion	:	
	:	14-NOI-01
Notice of Inquiry regarding retail	:	
electric market issues	:	

COMMONWEALTH EDISON COMPANY'S
RESPONSES TO APRIL 28, 2015 FOLLOW-UP QUESTIONS

Commonwealth Edison Company ("ComEd") submits these Responses to the April 28, 2015 Follow-Up Questions in connection with this Illinois Commerce Commission ("ICC or Commission") Notice of Inquiry ("NOI").

Consumer Education

Question for ComEd: At what point would "critical mass" have been reached to alleviate ComEd's concern of creating an appearance of ComEd endorsement of RES offerings?

While "critical mass" should not be evaluated in terms of a specific measure or number, Section 16-113(a) suggests that offerings from at least three suppliers would be an appropriate minimum threshold. 220 ILCS 5/16-113(a). More important than the number of suppliers, however, is the level of commitment suppliers have to such offerings, as those suppliers must stand ready to meet the requests of customers that ComEd would refer to them. For example, when ComEd submitted its Reply Comments, there were three Advanced Metering Infrastructure ("AMI")-enabled, Retail electric supplier ("RES") time-of-use supply price and demand response offerings on the PlugInIllinois.org website with a handful of customers participating in such offers. Without divulging competitively sensitive information, ComEd understands that the initial customer cap imposed on Rider RMUD – Residential Meter Usage Data ("Rider RMUD") was never approached due to the pilot treatment of the initial offering.

However, with the customer cap in Rider RMUD lifted and scheduled to be eliminated by year's end and issues with respect to RES access to historic data having been resolved by the Commission and processes to provide such data under development at ComEd, it is ComEd's expectation that critical mass of meaningful offers can be achieved in the near future.

Question for the suppliers: Do you object to such periodic bill messages being included for all customers?

There is no need to "add[] periodic bill messages to check PlugInIllinois.org for the latest information about the bundled and competitive rates." As a result of the 2011 NOI process, each of ComEd's bills *already* includes the PlugInIllinois.org website address. ComEd Reply Comments at 5.

Cancellation/Rescission

Question for ComEd: Please explain why ComEd's corresponding enrollment blackout window is 18 calendar days instead of Ameren's 12 to 16 calendar days.

As an initial matter, it is unclear to ComEd what is meant by "blackout window," and ComEd does not have any background or understanding of Ameren's business processes or why it has a window of "12 to 16 calendar days."

Putting aside these issues, ComEd interprets this question as referring to its 18-calendar day direct access service request ("DASR") enrollment window. Upon the receipt of an enrollment DASR from a RES, ComEd ensures that there are 18 calendar days remaining before the customer's scheduled switch date (which, for residential customers, is a date within the customer's 4-day meter reading window). The length of the enrollment window takes into account and accommodates several activities: (i) the letter informing the customer of the pending switch can take 3-5 days to reach the customer, including weekends and holidays; (ii) the customer's decision of whether to rescind must be made no less than 5 days prior to the customer's switch date (which provides at least 10 days for the customer to rescind the DASR);

and (iii) ComEd must have time to process the rescind request. This enrollment window period thus seeks to strike a balance between providing sufficient time for rescission of the enrollment (taking into account weekends and holidays and postal delivery) while also setting a fixed amount of time that is easy for customers to understand.

Question: In the absence of requiring off-cycle switching for residential and small commercial customers, is it worthwhile considering a shortening of the Part 412 rescission period to 8 calendar days?

It is unclear how shortening the Part 412 rescission period is relevant to the issue of variable rates that is under consideration in this NOI. In order to provide customers the flexibility to rescind an enrollment based upon their scheduled switch date, thus enhancing the customer experience over the minimum requirements set in Code Part 412.210, ComEd currently provides for rescission up to 5 days prior to the scheduled meter reading (switching) date. Thus a change in the rule from 10 to 8 calendar days for a rescission has no impact on customers. As ComEd previously noted, changing the switching timing does not address or resolve the issue of customer education. ComEd Surreply Comments at 11.

Question: In the absence of requiring off-cycle switching for residential and small commercial customers, is it worthwhile considering an optional shorter rescission period? If so, under which specific circumstances should a RES or customer be able to request the shorter rescission period?

Please see ComEd's response to the prior question.

Question for ComEd: Please describe the potential transmission and processing issues stated above.

Smart meters, like any electronic device, can experience technical issues. The transmittal and use of smart meter data can be adversely impacted for a variety of reasons. For example, a damaged meter may register usage but be unable to transmit such data to ComEd. Or, a strong lightning storm may cause a temporary disruption of radio frequency signals between smart meters and their nodes. Further, an internal IT system may generate an error code, requiring

manual intervention. While this is not a comprehensive list of possible issues that may arise, it sheds light on some of the potential transmission and processing issues that can be associated with smart meters.

Dated: May 14, 2015

Respectfully submitted,

Commonwealth Edison Company

By: 

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